

1       Edwin Aiwanian (Cal. State Bar No. 232943)  
2                    *edwin@calljustice.com*  
3       Arby Aiwanian (Cal. State Bar No. 269827)  
4                    *arby@calljustice.com*  
5       Joanna Ghosh (Cal. State Bar No. 272479)  
6                    *joanna@calljustice.com*  
7       **LAWYERS for JUSTICE, PC**  
8       410 West Arden Avenue, Suite 203  
9       Glendale, California 91203  
10      Telephone: (818) 265-1020  
11      Facsimile: (818) 265-1021

7 *Attorneys for Plaintiff Ruby Danielsson*  
8 *[additional counsel on following page]*

10

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RUBY DANIELSSON, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act,

Plaintiff,

VS.

BLOOD CENTERS OF THE PACIFIC, a California corporation; BLOOD SYSTEMS, an unknown business entity; VITALANT, an unknown business entity; and DOES 2 through 100, inclusive,

## Defendants.

Case No.: 3:19-cv-04592-JCS

Honorable Joseph C. Spero

**JOINT CASE STATUS UPDATE AND  
STIPULATION TO CONTINUE  
FURTHER CASE MANAGEMENT  
CONFERENCE; ~~[PROPOSED]~~ ORDER  
THEREON**

Complaint Filed: March 29, 2019  
FAC Filed: June 4, 2021  
Trial Date: None Set

22

24

26

28

1 **OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
P.C.**

2 Thomas M. McInerney (Cal. State Bar No. 162055)  
One Embarcadero Center, Suite 900  
3 San Francisco, California 94111  
Tel: 415.442.4810  
4 Fax: 415.442.4870  
5 tmm@ogletree.com

6 Attorneys for Defendant VITALANT,  
f/ka Blood Systems, Inc.  
7 formerly d/b/a Blood Centers of the Pacific,  
erroneously sued herein as Blood Centers of the  
8 Pacific and Blood Systems

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

LAWYERS for JUSTICE, PC  
410 West Arden Avenue, Suite 203  
Glendale, California 91203

1 Plaintiff Ruby Danielsson (“Plaintiff”) and Defendant Vitalant, f/k/a Blood Systems, Inc.  
2 formerly d/b/a Blood Centers of the Pacific (“Defendant”) (collectively, the “Parties”), by and  
3 through their undersigned counsel, file this status update in advance of the Further Case  
4 Management Conference that is currently scheduled for November 19, 2021 at 2:00 p.m. in the  
5 above-entitled Court and hereby stipulate as follows:

6 **WHEREAS**, the Parties have reached a class-wide settlement, which if approved by this  
7 Court, will resolve the above-captioned action in its entirety;

8 **WHEREAS**, Plaintiff has prepared a motion for preliminary approval of class action  
9 settlement (“Motion for Preliminary Approval”) and has provided the Motion for Preliminary  
10 Approval to Defendant;

11 **WHEREAS**, the Parties are conferring to determine a mutually acceptable hearing date  
12 for the Motion for Preliminary Approval and Plaintiff anticipates filing the Motion for  
13 Preliminary Approval within approximately seven (7) calendar days;

14 **THEREFORE, IT IS HEREBY STIPULATED**, between the Parties, by and through  
15 their respective counsel of record, subject to an order of the Court, that the Further Case  
16 Management Conference be continued by at least thirty (30) calendar days, to a date and time  
17 that is convenient for the Court, to allow Plaintiff to file the Motion for Preliminary Approval.

18 **IT IS SO STIPULATED.**

19 Dated: November 15, 2021

**LAWYERS for JUSTICE, PC**

20 By: /s/ Edwin Aiawazian  
21 Edwin Aiawazian  
22 *Attorneys for Plaintiff*

23 Dated: November 15, 2021

**OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.**

24 By: /s/ Thomas M. McInerney  
25 Thomas M. McInerney  
26 *Attorneys for Defendant*

27  
28 **“I hereby attest that I have on file all  
holographic signatures corresponding  
to any signature (/S/) within this e-filed  
document.”**

**[PROPOSED] ORDER**

The Court, having reviewed the Parties' Joint Case Status Update and Stipulation to Continue Further Case Management Conference, orders as follows:

The Further Case Management Conference scheduled for November 19, 2021, at 2:00 p.m. is continued to \_\_\_\_\_ via video conference.

## IT IS SO ORDERED.

Dated: November 16, 2021



**LAWYERS for JUSTICE, PC**  
410 West Arden Avenue, Suite 203  
Glendale, California 91203